



## Filing Receipt

**Received - 2022-04-29 04:42:53 PM**  
**Control Number - 52938**  
**ItemNumber - 132**



## Public Utility Commission of Texas

### Annual Report

Required by 16 Texas Admin. Code § 25.97(f)

**PROJECT NO.** 52938

**AFFECTED ENTITY:** AEP Texas Inc.

#### General Information

Pursuant to 16 Texas Admin. Code § 25.97(f)(1), not later than May 1 of each year, each affected entity must submit this report for the preceding calendar year. The first report must be submitted not later than May 1, 2020.

#### Instructions

Answer all questions, fill-in all blanks, and have the report notarized in the affidavit. If you check no in part 1.a, leave parts 1.b-d blank.

Violations resulting from, and incidents, fatalities, or injuries attributable to a violation resulting from, a natural disaster, weather event, or man-made act or force outside of an affected entity's control are not required to be reported.

#### Affidavit

A representative of the affected entity must swear to and affirm the truthfulness, correctness, and completeness of the information provided by attaching a signed and notarized copy of the Affidavit provided with this form.

#### Filing Instructions

Submit four copies (an original and three copies) of the completed form and signed and notarized Affidavit to:

Central Records Filing Clerk  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
Telephone: (512) 936-7180



1. This part applies only to an affected entity that owns or operates overhead transmission facilities greater than 60 kilovolts.

a) Does this part 1 apply to you? Yes ☒ No ☐

b) Provide the number of identified occurrences of noncompliance with Public Utility Regulatory Act (PURA) § 38.004 regarding vertical clearance requirements of the National Electrical Safety Code (NESC) for overhead transmission facilities.

AEP Texas performed a comprehensive LiDAR (light detection and ranging) based analysis. LiDAR is an aerial survey methodology that utilizes laser technology to capture precise location detail of the entire transmission line and the associated corridor.

During 2021, approximately 8,400 spans were inspected using the LiDAR method, and 1,278 spans were identified as possible occurrences of noncompliance with National Electric Safety Code (NESC) vertical clearance requirements. Of these, less than 1% of the spans were identified as locations that warranted a field inspection. These field inspections have been completed and any interim mitigation efforts (if necessary) have been completed or are being planned.

Most identified spans have deviations from stated NESC clearances that do not require immediate action or correction under the NESC. All identified spans will be thoroughly evaluated and final mitigation plans developed and prioritized consistent with NESC requirements. During 2021, 14 spans crossing lakes listed in House Bill 4150 were identified. All 14 of those occurrences were further analyzed and mitigated by December 31, 2021.



- c) Do you have actual knowledge that any portion of your transmission system is not in compliance with PURA § 38.004 regarding vertical clearance requirements of the NESC for overhead transmission facilities?

Other than what was identified in subpart b) above, AEP Texas does not have any actual knowledge that any portion of its transmission system is not in compliance with PURA § 38.004 regarding vertical clearance requirements at the conclusion of the reporting period.

In Project No. 50596 and Project No. 51890, AEP Texas self-identified six possible violations, all of which are on the Carver - Maxwell 138 kV line that is approximately 56 miles in length. Although the line was designed according to NESC when it was constructed in the late 1960s, AEP Texas believes the occurrences have come to light as a result of the greater accuracy of modern survey and design tools. The occurrences were identified as part of the planning process for a rebuild of the line, which will begin the engineering and design phase in the coming months. The line is located in a remote area of west Texas, and AEP Texas does not believe the occurrences represent a risk to the public requiring immediate remediation per the NESC. The Carver-Maxwell 138 kV line does not cross a lake listed in PURA § 38.004(b).

- d) Do you have actual knowledge of any violations of easement agreements with the United States Army Corps of Engineers relating to PURA § 38.004 regarding vertical clearance requirements of the NESC for overhead transmission facilities?

AEP Texas has no actual knowledge of any violations of easement agreements with the United States Army Corps of Engineers relating to PURA § 38.004 regarding vertical clearance requirements of the NESC for overhead transmission facilities during the reporting period.



2. This part applies to an affected entity that owns or operates overhead transmission facilities greater than 60 kilovolts or distribution facilities greater than 1 kilovolt.
- a) Provide the number of fatalities or injuries of individuals other than employees, contractors, or other persons qualified to work in proximity to overhead high voltage lines involving transmission or distribution assets related to noncompliance with the requirements of PURA § 38.004.

During the reporting period, AEP Texas had no fatalities or injuries of individuals other than employees, contractors, or other persons qualified to work in proximity to overhead high voltage lines involving transmission or distribution assets related to noncompliance with the requirements of PURA § 38.004.



b) Provide a description of corrective actions taken or planned to prevent the reoccurrence of fatalities or injuries described in subpart a), immediately above.

Not applicable. See response to 2. a).



**AFFIDAVIT**

I swear or affirm that I have personal knowledge of the facts stated in this report or am relying on people with personal knowledge, that I am competent to testify to them, and that I have the authority to submit this report on behalf of the affected entity. I further swear or affirm that all statements made in this report are true, correct, and complete.

Judith E Talavera  
Signed on 2022/04/29 09:05:57 -8:00  
Signature

Judith E. Talavera  
Printed Name

President & COO - Texas  
Job Title

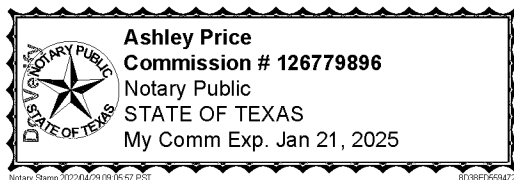
AEP Texas Inc.  
Name of Affected Entity

Sworn and subscribed before me this 29<sup>th</sup> day of April, 2022.  
Month Year

Ashley Price  
Signed on 2022/04/29 09:05:57 -8:00

Notary Public in and For the State of Texas.

My commission expires on 01/21/2025.



Notarial act performed by audio-visual communication





## 04-29\_Talavera\_Project No. 52938 AEP Texas 2021 Annual\_Report - Final.pdf

DocVerify ID: B6B88E6B-03B3-4A54-BF18-DB20E87A0425  
 Created: April 29, 2022 08:45:43 -8:00  
 Pages: 6  
 Remote Notary: Yes / State: TX

This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system. This remote online notarization involved the use of communication technology.

Go to [www.docverify.com](http://www.docverify.com) at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

### E-Signature Summary

#### E-Signature 1: Judith E Talavera (JET)

April 29, 2022 09:05:57 -8:00 [B5AF0F62D0F5] [161.235.221.105]  
 jetalavera@aep.com (Principal) (Personally Known)

#### E-Signature Notary: Ashley Price (AP)

April 29, 2022 09:05:57 -8:00 [8D38ED559472] [167.239.221.102]  
 amprice@aep.com  
 I, Ashley Price, did witness the participants named above electronically sign this document.

